

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MIKE TURNER, On Behalf of Himself)
and All Others Similarly Situated,)
)
)
Plaintiff,)
)
)
v.))
)
ANDREW J. FILIPOWSKI, MICHAEL P.)
CULLINANE, PAUL L. HUMENANSKY,)
TOMMY BENNET, JOHN COOPER,)
JAMES E. COWIE, MICHAEL H.)
FORSTER, ARTHUR W. HAHN,)
THOMAS J. MEREDITH, J. KEVIN)
NATER and JOHN RAU,)
)
)
Defendants.)
)
)

CIVIL ACTION No.
4-CV-12294-NMG

MOTION FOR ADMISSION OF ATTORNEYS *PRO HAC VICE*

Defendants Tommy Bennett, John Cooper, James E. Cowie, Michael H. Forster, Arthur W. Hahn, Thomas J. Meredith, J. Kevin Nater and John Rau hereby move for an Order admitting John F. Hartmann and Michael A. Duffy of the law firm Kirkland & Ellis LLP, 200 East Randolph Drive, Chicago, IL 60601, to the Bar of this Court pursuant to Local Rule 83.5.3. (A Proposed Order is annexed hereto at Exhibit 1.) As grounds for this motion, defendants state as follows:

1. The undersigned is a member of this Court, in good standing, and submits a supporting affidavit and notice of appearance contemporaneously herewith. (The required admission fee is being filed separately. See Electronic Filing Administrative Procedure "F.")

2. Messrs. Hartmann and Duffy have executed Certificates of Good Standing in accordance with Local Rule 83.5.3, which are also submitted contemporaneously herewith.

Dated: December 15, 2004
Boston, MA

Respectfully Submitted,

/s/ Mayeti Gametchu
Kevin J. O'Connor (BBO# 555250)
Mayeti Gametchu (BBO# 647787)
PARAGON LAW GROUP, LLP
184 High Street
Boston, MA 02110
(617) 399-7950
oconnor@paragonlaw.com
gametchu@paragonlaw.com

Attorneys for Defendants

TOMMY BENNETT, JOHN
COOPER, JAMES E. COWIE,
MICHAEL H. FORSTER,
ARTHUR W. HAHN, THOMAS J.
MEREDITH, J. KEVIN NATER and
JOHN RAU

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1, defense counsel attempted to confer with counsel for the plaintiff, Patrick J. Sherlock, Esq. and Brian J. Robbins, Esq., but have been unable to reach them. Most recently, on December 14, 2004, defense counsel left a voice mail for counsel for Plaintiff, which as not been returned.

/s/ Mayeti Gametchu

CERTIFICATE OF SERVICE

I, Mayeti Gametchu, hereby certify that, on December 15, 2004, I caused a true and correct copy of the foregoing document to be served upon the following parties:

For Plaintiff:

Patrick J. Sherlock, Esq.
Law Office of Patrick J. Sherlock
11 South La Salle Street
Suite 1600
Chicago, IL 60603

Brian J. Robbins, Esq.
Marc M. Umeda, Esq.
Bradley R. Mathews, Esq.
Robbins, Umeda & Fink, LLP
1010 Second Avenue, Suite 2360
San Diego, California 92101

(via overnight delivery)

For Defendants:

John F. Hartmann
Michael A. Duffy
Kirkland & Ellis, LLP
AON Center
200 E. Randolph Drive
Chicago, IL 60601

Samuel B. Isaacson
Joseph Collins
Piper Rudnick
203 N. LaSalle Street
Suite 1800
Chicago, IL 60601

Joel G. Chefitz
James E. Hanlon
Howrey, Simon, Arnold & White, LLP
321 N. Clark Street
Suite 3400
Chicago, IL 60610

(via U.S. mail)

/s/ Mayeti Gametchu